

FILED  
CLERK OF COURT  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
2005 MAY 27 P 1:43

Civil Action No.: 05-CV-11080-GAO

JANE DOE, )  
Plaintiff, )  
v. )  
SHERIFF OF ESSEX COUNTY d/b/a )  
ESSEX COUNTY CORRECTIONAL ALTERNATIVE )  
CENTER, FRANK G. COUSINS, JR., Individually, )  
and in his Official Capacity as Sheriff of Essex County, )  
ANDOVER HOUSING AUTHORITY, and )  
CHRISTINE METZEMAKERS, Individually, and in her )  
Official Capacity as Executive Director of the Andover )  
Housing Authority, )  
Defendants. )

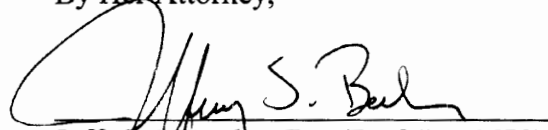
**Plaintiff's Motion For Approval To Utilize The General Grant of Access To  
Criminal Offender Record Information Pursuant to G.L. c. 6, § 172(c)**

The Criminal History Systems Board ["CHSB"] approved a general grant of access to criminal offender record information ["CORI"] to attorneys engaged in civil litigation. Pursuant to G.L. c. 6, § 172(c), the Plaintiff respectfully requests that this court allow the Plaintiff to access the criminal offender record information of Alexander Mattei (d.o.b. 02/20/1964) ["Mattei"]. On or about April 26, 2003, the Plaintiff resided in an apartment owned and controlled by the Defendant, the Andover Housing Authority ["AHA"]. On or about April 26, 2003, Mattei, an inmate at the Essex County House of Correction and a violent offender, was on the premises of the AHA as part of a community service/work release program referred to as the Essex County Correctional Alternative Center ["CAC"]. Mattei, while unsupervised, brutally attacked and sexually assaulted the Plaintiff.

The Plaintiff is now seeking any and all criminal record information relative to Mattei including but not limited to all convictions and arrest reports. Such information will be used exclusively for witness impeachment purposes and/or trial strategy related to the above-captioned civil case. In support of this motion, the Plaintiff submits the appended affidavit of Jeffrey S. Beeler.

WHEREFORE, the Plaintiff respectfully requests that the Court allow the Plaintiff to access the criminal offender record information of Alexander Mattei.

Respectfully Submitted,  
The Plaintiff,  
By Her Attorney,

A handwritten signature in black ink, appearing to read "Jeffrey S. Beeler", is written over a horizontal line.

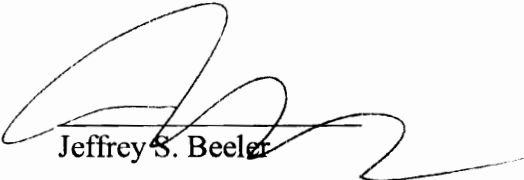
Jeffrey S. Beeler, Esq. (BBO# 563679)  
HEINLEIN & BEELER, P.C.  
207 Union Street  
South Natick, MA 01760  
(508) 655-8700 (Tel)  
(508) 655-2700 (Fax)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25 day of May, 2005, I served a true and accurate copy of the foregoing document by first class mail, postage prepaid on:

Martin Rooney, Esq.  
Curley & Curley  
27 School Street  
Boston, MA 02108

Stephen C. Pfaff, Esq.  
Merrick, Louison & Costello  
67 Batterymarch Street  
Boston, MA 02110

  
Jeffrey S. Beeler

## **Exhibit A**

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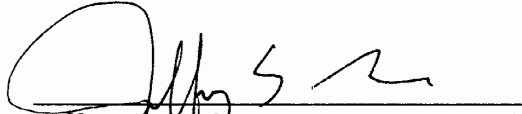
**AFFIDAVIT OF JEFFREY S. BEELER**

I, Jeffrey S. Beeler, state that the following facts are true and are within my personal knowledge and belief:

1. I am Jeffrey S. Beeler, counsel for the plaintiff in the above captioned matter and a member in good standing of the Massachusetts Bar.
2. I make this affidavit freely and in support of the Plaintiff's Motion for Approval to Utilize the General Grant of Access to C.O.R.I.
3. The information accessed will be used exclusively for witness impeachment purposes and/or trial strategy related to the above-captioned civil case.

4. The requested information will not be disclosed to unauthorized persons and/or in violation of G.L. c. 6, § 167 et seq. or 803 CMR 1.00 et seq.

Signed under the pains and penalties of perjury this 25 day of May, 2005.

A handwritten signature in black ink, appearing to read "Jeffrey S. Beeler", is written over a horizontal line.

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